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PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC

George Adomavicius <gadomavic@gmail.com>

Re: Adomavicius v. International Business Machines - EDNC 5:23-cv-00656-D

1 message

George Adomavicius <gadomavic@gmail.com>

Mon, Dec 11, 2023 at 8:58 PM

To: "Federmack, Jason V. (Raleigh)" <Jason.Federmack@jacksonlewis.com>
Cc: "Barry, Kathryn J. (Long Island/Raleigh)" <Kathryn.Barry@jacksonlewis.com>

Thank you for contacting me - I agree to your request for 30 days

I would like to respond/comment to a few of the points in your motion, if I may.

1. I also noticed the error in zip code, and contacted both the Clerk's Office and the Case Manager, Stehanie Mann, as to whether that was a concern. It was suggested that submitting an amended Claim could correct this, but was not necessarily urgent as the due date of December 9 had not passed yet. Do you feel that is warranted as we have now established communication, and you are also on the electronic notification process?
2. The USPS tracking indicated delivery to the 160 Mine Lake Court address, but as I waited for the physical receipt card apparently in vain as its tracking number seemed stuck at "out for delivery"
3. I finally went to the Morrisville USPS on 11/28 and got the electronic receipt signed by T. Wood to submit as proof of service.
4. On Dec 5 I went to that address, suite 200, met Tabitha Wood and asked if she did in fact receive on behalf of IBM and what might she have done with that document on Saturday Nov 18.

She replied she scanned it in and faxed it to IBM as she always did. I asked how did she know it went through OK and she answered "they call if there's any issue".

So until I received your email, I felt I had done all the due diligence I could to ensure that my reported service, and proof of service, to the Court was accurate and factual. I am glad to see it was properly received, even if with some slight delay.

Please feel free to reach out at any time.

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On Mon, Dec 11, 2023 at 8:16 PM Federmack, Jason V. (Raleigh) <Jason.Federmack@jacksonlewis.com> wrote:

Mr. Adomavicius,

Please see attached for service the following documents which were electronically filed with the Court today:

1. Notice of Appearance of Jason V. Federmack;
2. Disclosure of Corporate Affiliations for IBM;
3. Motion for Extension of Time to Move, Serve an Answer or Otherwise Plead; and
4. Proposed Order Granting Motion for Extension of Time.

Best,

Jason Federmack

Jurgis Adomavicius

Litigant Response to Defendant's Motion
for Time Extension dated 12/11/2023
Jurgis Adomavicius 12/12/2023

 JL**Jason V. Federmack**

Attorney at Law

Jackson Lewis P.C.3737 Glenwood Avenue
Suite 450

Raleigh, NC 27612

Direct: (919) 760-6471 | Main: (919) 760-6460

Jason.Federmack@jacksonlewis.com | www.jacksonlewis.com**From:** Federmack, Jason V. (Raleigh) <Jason.Federmack@jacksonlewis.com>**Sent:** Monday, December 11, 2023 6:41 PM**To:** gadomavic@gmail.com**Cc:** Barry, Kathryn J. (Long Island/Raleigh) <Kathryn.Barry@jacksonlewis.com>**Subject:** Adomavicius v. International Business Machines - EDNC 5:23-cv-00656-D

Dear Mr. Adomavicius,

Good evening. Kate Barry and I, and the law firm Jackson Lewis PC, will be representing IBM in connection with the lawsuit you have filed. We have only just been retained to represent IBM in this matter and would like to request a 30 day extension of time to respond to your Complaint, to and including January 10, 2024. Would you please let me know if you consent to that extension of time?

Thanks,

Jason Federmack

 **Jason V. Federmack**

Attorney at Law

Jackson Lewis P.C.3737 Glenwood Avenue
Suite 450

Raleigh, NC 27612

Direct: (919) 760-6471 | Main: (919) 760-6460

Jason.Federmack@jacksonlewis.com | www.jacksonlewis.com

Sincerely yours

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919-201-0475